

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

KAREN SUMMERSET, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

LIBERTY MUTUAL INSURANCE
COMPANY,

Defendant.

Case No. 25-cv-11121-PBS

CLASS ACTION

JURY TRIAL DEMANDED

PROPOSED SCHEDULE

Plaintiff, Karen Summerset (“Plaintiff”) and Defendant Liberty Mutual Insurance Company (“Defendant” or “Liberty Mutual”) (together with Plaintiff, the “Parties”), through their undersigned counsel, submit this Report following the October 30, 2025 Rule 16 conference to submit the below Proposed Pretrial Schedule.

EVENT	PROPOSAL
Deadline to Amend Pleadings	November 28, 2025
Discovery Deadline	June 16, 2026
Plaintiff’s Expert Reports	July 16, 2026

Defendant's Expert Reports	August 17, 2026
Any Reply Reports	September 9, 2026
Class Certification Motion Deadline	September 30, 2026
Summary Judgment Deadline	September 30, 2026
Pretrial Conference	TBD
Trial	TBD

Dated: November 5, 2025

Respectfully Submitted,

Attorneys for Plaintiff,
By Counsel

Liberty Mutual Insurance Company,
By its attorney,

/s/ Anthony I. Paronich
Anthony I. Paronich
PARONICH LAW, P.C.
350 Lincoln Street, Suite 2400
Hingham, MA 02043
Telephone: (508) 221-1510
anthony@paronichlaw.com

/s/ Kevin P. Polansky
Kevin P. Polansky, Esq. (BBO #667229)
kevin.polansky@nelsonmullins.com
Nelson Mullins Riley & Scarborough LLP
One Financial Center, Suite 3500
Boston, MA 02111
Tel. (617) 217-4700

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Anthony I. Paronich

Anthony I. Paronich